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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
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12 VALERIE D. HUBBARD,

13 Plaintiff,

14 vs.

15 DAY & ZIMMERMANN HAWTHORNE
16 CORPORATION, a foreign corporation,

17 Defendants.

Case No. 3:12-cv-00681-MMD-VPC

18 **STIPULATION and REQUEST TO BE EXCUSED FROM**
19 **PRE-SETTLEMENT CONFERENCE OFFERS AND COUNTEROFFERS**

20 Comes Now, Plaintiff and Defendant, by and through undersigned counsel and hereby
21 stipulate and request leave from this Court to not provide any Offers or Counteroffers as required in
22 this Court's Order Scheduling Settlement Conference. (docket #44). Plaintiff resides out of state
23 and Plaintiff's counsel has a face-to-face meeting scheduled with Plaintiff later next week. Until
24 that meeting occurs Plaintiff's counsel is of the opinion that any offer made by Plaintiff would not be
25 productive and Plaintiff's counsel does not want to provide any non-productive offers that could
26 jeopardize the good will of the settlement conference process. At this time the parties desire to let
27 the settlement conference process educate and assist the parties in understanding the issues so well
28 thought out settlement offers by the parties can be made. For the foregoing reasons, the parties

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1 request that they be relieved from the obligation of sending settlement offer demands and counter-
2 demands.

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5 DATED: September 18, 2015
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8 /s/ Brian R. Morris
BRIAN R. MORRIS

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10 /s/ Kenneth R. Bick
KENNETH R. BICK

11 IT IS SO ORDERED
12 Valerie P. Rife
U.S. MAGISTRATE JUDGE

13 DATED: September 21, 2015
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